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January 14, 2022

VIA ELECTRONIC FILING

Honorable Judge C. Darnell Jones II
United States District Court for the Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: Bethany Katz v. DNC Services Corporation, et al.
Docket No. 2:16-cv-05800-CDJ

Dear Judge Jones:

This firm represents Plaintiffs in the above referenced matter. Please accept this letter regarding the statue of this matter on behalf of both Parties.

The opt-in period closed in this matter in September of last year. The Parties are currently engaged in written discovery. Plaintiffs served their collective-wide requests in December, and Defendant is preparing its responses.

The Parties understand the Court's order may have implied proposing a schedule, including for Plaintiffs' anticipated Rule 23 class certification motion, among other deadlines. The Parties conferred regarding a schedule, and during such discussions, agreed that all Parties' interests would be best served by engaging in class mediation prior to engaging in additional (non-written) discovery and motion practice.

The Parties are working on selecting a mediator and scheduling mediation. The Parties jointly request the Court provide them until January 31, 2022 to further update the Court on the status of this action. At that time, the Parties anticipate they will have a mediation scheduled, and will inform the Court as to when the mediation will occur, and can provide a schedule if mediation is unsuccessful.

The Parties thank the Court for its consideration to this request.

Respectfully submitted,

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